

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re:)	IN CHAPTER 7 PROCEEDINGS
)	
WILLIAM WARREN HOMES,)	BK 13-30927
)	
Debtor(s).)	
)	
DONALD M. SAMSON, Trustee,)	
)	
Plaintiff,)	
)	
vs.)	Adv. 13-
)	
SWIFT ROCK FINANCIAL, INC., d/b/a World)	
Law Direct, World Law Group, World Law Plan,)	
World Law Debt Settlement, World Law Debt)	
Debt Services, World Law Options, and World)	
Law Debt Assistance, a Texas corporation; and)	
)	
ORION PROCESSING, LLC, d/b/a World Law)	
Processing and WLD Credit Repair, a Texas)	
Limited liability company,)	
)	
Defendant(s).)	

COMPLAINT FOR FRAUDULENT TRANSFER

The Complaint of Donald M. Samson, trustee, respectfully alleges:

COUNT I

1. That Donald M. Samson is the duly qualified and acting trustee in this case.
2. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §1334 as a core proceeding pursuant to 28 U.S.C. §157(b)(2)(E). Venue properly lies in this judicial district pursuant to 28 U.S.C. §1409(a), in that the instant adversary proceeding is related to the above-captioned case under title 11 of the United States Code which is still pending.
3. Defendant SWIFT ROCK FINANCIAL, INC. (“SWIFT ROCK”) is a Texas corporation that purports to be a law firm in the business of providing “quality debt relief options, backed by attorneys” to consumers. SWIFT ROCK conducts business under the name “World Law Debt.”
4. Defendant SWIFT ROCK also offers its services under other assumed business names, including World Law Direct, World Law Group, World Law Plan, World Law Debt Settlement, World Law Debt Services, World Law Options, and most recently World Law Debt Assistance. SWIFT ROCK’s principal place of business is in Austin, Texas.
5. Defendant ORION PROCESSING, LLC (“ORION”) is a Texas limited-liability company. ORION conducts business under the name “World Law Processing” and “WLD Credit Repair.” ORION’s principal place of business is in Austin, Texas.

6. This case was commenced on May 16, 2013. Within two years prior to the commencement of the case, debtor transferred to the defendant \$3,475.22 pursuant to a debt settlement agreement entered into between defendant and debtor, William Warren Homes dated 10/8/12. The debtor received no consideration or inadequate consideration in exchange for such transfer and at the time thereof was insolvent or became such as a result of such transfer.

7. Said transfer is fraudulent as to the trustee and may be avoided by him pursuant to 11 U.S.C. § 548.

COUNT II

1-5. Plaintiff Donald M. Samson, trustee, re-alleges the allegations in paragraphs 1-5 of Count I.

6. Defendants, Swift Rock Financial, are a "Debt Settlement Provider" as defined by the Debt Settlement Consumer Protection Act 225 ILCS 429 et seq.

7. Said defendants, have failed to comply with said act by, among other violations, acting as a debt settlement provider in the State of Illinois without first obtaining a license under said act, thus providing Plaintiff all rights and remedies available under the Consumer Fraud and Deceptive Business Practices Act.

WHEREFORE, the trustee prays for judgment in the amount of \$3,475.22 together with costs of suit incurred herein in the amount of \$293.00 and for such further relief as this Court deems just and equitable.

DATE: 1/21/14

/s/ Donald M. Samson
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